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6 **DISTRICT COURT**

7 **CLARK COUNTY, NEVADA**

8 DINA BARELA, individually

9
10 Plaintiff,

11 vs.

12 USAA CASUALTY INSURANCE
13 COMPANY; DOES 1 through 20; ROE
14 BUSINESS ENTITIES 1 through 20, inclusive
15 jointly and severally

16 Defendants.

CASE NO.: 2:21-cv-00084-RFB-VCF

**STIPULATION AND
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF TO FILE HER REPLY TO
DEFENDANT USAA CASUALTY
INSURANCE COMPANY'S
OPPOSITION TO PLAINTIFF'S
MOTION TO REMAND**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff DINA
18 BARELA, through her counsel of record, SAMANTHA A. MARTIN, ESQ. of the RICHARD
19 HARRIS LAW FIRM, and Defendant USAA CASUALTY INSURANCE COMPANY, through
20 their counsel of record, ROBERT W. FREEMAN, ESQ., PRISCILLA L. O'BRIANT, ESQ. and
21 JENNIFER A. TAYLOR, ESQ. of LEWIS BRISBOIS BISGAARD & SMITH LLP, that the
22 deadline for Plaintiff to file her Reply to Defendants' Opposition to Plaintiff's Motion to
23 Remand shall be extended from February 11, 2021 to February 19, 2021. The Opposition was
24 filed on February 4, 2021. This is the first request for extension of time for Plaintiff to file her
25 Reply to Defendants' Opposition. This Stipulation and Order is submitted in accordance with
26 LR IA 6-1.

27 The parties request this brief extension because counsel for Plaintiff has been
28 participating in, and preparing for, a bench trial in front of Magistrate Judge Cam Ferenbach in



the case of *Tucker v. United States of America*, Case No. 2:18-cv-02255-VCF, which took place on February 8 and February 9, 2021. This short extension of time will allow Plaintiff to fully address each of the arguments set forth in Defendants' Opposition to aid this Court in its ultimate decision as to whether this matter should be remanded back to state court.

Accordingly, the parties respectfully request this Court to approve the foregoing stipulation. Their requested extension is not made in bad faith or to unnecessarily delay these proceedings.

DATED this 11th day of February, 2021.
RICHARD HARRIS LAW FIRM

/s/ Samantha A. Martin

Samantha A. Martin, Esq.
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Attorney for Plaintiffs

DATED this 11th day of February, 2021
**LEWIS BRISBOIS BISGAARD &
SMITH LLP**


/s/ Jennifer A. Taylor

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Attorneys for Defendants

ORDER

IT IS SO ORDERED.

DATED this 11th day of February, 2021.


RICHARD E. BOULWARE, II
United States District Court
DATED this 13th day of February, 2021.